Nanci L. Clarence (SBN 122286) Josh A. Cohen (SBN 217853) CLARENCE DYER & COHEN LLP 899 Ellis St. San Francisco, CA 94109 Tel: (415) 749-1800 Fax: (415) 749-1694 nclarence@clarencedyer.com icohen@clarencedyer.com 7 Attorney for Defendant RAGINI VECHAM 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 SAN JOSE DIVISION 11 CASE NO. CR-15-0427 BLF (HRL) UNITED STATES OF AMERICA, 12 AMENDED STIPULATION AND Plaintiff, [PROPOSED] ORDER MODIFYING 13 DEFENDANT RAGINI VECHAM'S v. NDITIONS OF RELEASE TO PERMIT 14 TRAVEL OUT OF DISTRICT FROM RAGINI VECHAM, **JUNE 5 THROUGH JUNE 22, 2016, AND** 15 **JUNE 28 THROUGH JULY 15, 2016** Defendant. 16 17 18 **STIPULATION** 19 Defendant Ragini Vecham has been on pretrial release since her initial appearance before 20 the magistrate court in September 2015. It is a condition of her pretrial release that Ms. Vecham 21 not travel outside the Northern District of California without the permission of the Court. 22 Ms. Vecham wishes to travel with her children to visit family in Reno, Nevada from June 23 5, 2016 through June 22, 2016. She also wishes to travel with her children and other members of 24 her extended family (not including co-defendant Kishore Pallapothu) to New York, New Jersey, 25 Washington, D.C., and Vermont from June 28, 2016 through July 15, 2016. 26 The government does not object to the modification of Ms. Vecham's release conditions to 27 accommodate this travel. Pretrial Services likewise does not object, provided that Ms. Vecham 28

Case No. CR-15-0427 BLF

STIPULATION AND ORDER MODIFYING CONDITIONS OF RELEASE

gives Pretrial Services all requested information concerning her travel and lodging plans in advance of her departure. Accordingly, the parties agree and stipulate that Ms. Vecham's conditions of release 3 should be modified to permit Ms. Vecham to travel to Reno, Nevada from June 5, 2016 through June 22, 2016; and to New York, New Jersey, Washington, D.C., and Vermont from June 28, 5 2016 through July 15, 2016. 6 IT IS SO STIPULATED. 7 8 DATED: May 26, 2016 JOSH COHEN Attorney for RAGINI VECHAM 10 DATED: May 26, 2016 11 TIMOTHY J. LUCEY Assistant United States Attorney 12 13 14 **ORDER** 15 By stipulation of the parties, and for good cause shown, it is hereby ordered that defendant 16 Ragini Vecham's conditions of release shall be modified as follows: Ms. Vecham shall be 17 permitted to travel from the Northern District of California to Reno, Nevada from June 5, 2016 to 18 June 22, 2016. Ms. Vecham shall also be permitted to travel from the Northern District of 19 California to New York, New Jersey, Washington, D.C., and Vermont from June 28, 2016 through July 15, 2016. Ms. Vecham shall provide Pretrial Services with travel and lodging information as 21 directed by Pretrial Services. All other conditions of reflease shall remain in effect. 22 IT IS SO ORDERED. 23 24 HOWARD R. LLOYD UNITED STATES MAGISTRATE JUDGE 25 26 27 28

Case No. CR-15-0427 BLF

STIPULATION AND ORDER MODIFYING CONDITIONS OF RELEASE